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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. C04-0098-SI

EDWARD ALVARADO, et al,

PLAINTIFF'S LIST OF WITNESSES

Plaintiffs,

Date: October 10, 2006

v.

FEDEX CORPORATION,

Time: 3:30 p.m.

Defendants.

Judge: Hon. Susan Illston

1 Plaintiff Charlotte Boswell, pursuant to the Court's Pre-Trial Instructions hereby submit a
 2 list of witnesses likely to be called at trial, other than solely for impeachment or rebuttal.
 3

4 WITNESSES	5 SUBSTANCE OF TESTIMONY
6 PEGGY REARDON	7 Human Resources Representative. Ms. 8 Reardon had conversations with Plaintiff 9 regarding her Discrimination Complaints 10 against Stites. Ms. Reardon will testify to 11 FedEx EEO Policies re harassment, retaliation, 12 and discrimination.
13 SHARON MCNEIL	14 Human Resources Representative. Ms. 15 McNeil had several conversations with 16 Plaintiff regarding acts of Retaliation (her 17 checks not given to her by Stites and delays).
18 NORMAN STITES	19 Mr. Stites is Plaintiff's Operation. Manager. 20 Plaintiff has alleged that Mr. Stites 21 discriminated against Plaintiff and retaliated 22 against Plaintiff after she complained of 23 harassment/discrimination. Stites will speak to 24 the operations at the Edes Facility in Oakland, 25 job classifications of which Plaintiff worked. 26 Stites will testify to others that he managed and 27 harassed during his employment at FedEx.
28 Debbie Ingram	29 Ms. Ingram is a co-worker of Plaintiff, in the

1	same classification as Plaintiff. Ms. Ingram
2	will testify to that she worked at Fed Ex during
3	the period in question in this case. Ms. Ingram
4	will testify that Norman Stites, her manager,
5	made sexual advances toward her and Plaintiff
6	on numerous occasions, including during
7	workgroup meetings. Ms. Ingram will testify
8	that she and Plaintiff met Stites together and
9	complained directly to him about his
10	inappropriate sexual behavior. Ms. Ingram
11	observed Stites kiss Plaintiff and Plaintiff
12	pushed him away, this incident happened a
13	couple of months before Plaintiff's resignation.
14	Ms. Ingram will testify about a promotion
15	given to her and questions and answers given
16	to her by Stites for the job interview. Ms.
17	Ingram also will testify as to inappropriate
18	sexual E-mails sent by Stites to another female
19	co-worker Jennifer Thomas. Ms. Ingram will
20	testify as to Plaintiff's emotional distress.
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25	Jennifer Thomas
26	Ms. Thomas is a co-worker of Plaintiff. Ms.
27	Thomas will testify that she worked during the
28	same period as Plaintiff, was sexually harassed

1	by Norman Stites, and is a percipient witness
2	to Plaintiff's treatment.
3	Jennifer Thomas' mother
4	Ms. Thomas will testify as to conversations
5	that she had with Norman Stites and comments
6	made about allegations that Stites Sexually
7	harassed her daughter Jennifer Thomas
8	Doug Mino
9	Mr. Mino was a co-worker of Plaintiff. Mr.
10	Mino was a percipient witness to the
11	allegations of sexual harassment/discrimination
12	toward Plaintiff.
13	Christine Marlow
14	Ms. Marlow is a co-worker of Plaintiff. Ms.
15	Marlow will testify about favorable treatment,
16	being mentored by Stites.
17	Romona Hadeley
18	Ms. Hadley was a co-worker of Plaintiff in the
19	same job classification. Ms. Hadley will
20	testify as to favorable treatment she received
21	by Norman Stites (unearned hours, etc.).
22	Jessica Rodriguez
23	Ms. Rodriguez was a co-worker of Plaintiff in
24	the same job classification. Ms. Hadley will
25	testify as to favorable treatment she received
26	by Norman Stites (unearned hours, etc.).
27	Dale Billings
28	Mr. Billings is a co-worker of Plaintiff. Mr.
	Billings will testify to the amount of hours he

1	worked in overtime, after Plaintiff Complained
2	of discrimination.
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4	Paul Kaclowski
5	Mr. Kaclowski was Plaintiff's co-worker, in
6	the same job classification as Plaintiff. Mr.
7	Kaclowski will testify as to the mentorship
8	given to him by Mr. Stites. Mr. Kaclowski is
9	currently a Sr. Manager at FedEx.
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11	Lou Vigiletti
12	Mr. Vigiletti was Plaintiff's Sr. Manager for a
13	short time period. Mr. Vigiletti had
14	conversations with Plaintiff regarding the
15	Discrimination/Harassment.
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17	Michael Pigors
18	Mr. Pigors was the Vice President of the
19	Western Region at FedEx, one of Plaintiff's
20	manager, during the time period in question.
21	According to Defendant, Mr. Pigors was
22	instrumental in deciding which facilities to re-
23	organize and was part of Plaintiff's shift
24	change toward the end of her employment.
25	Mr. Pigors also can testify as to the financial
26	condition of FedEx during that time period and
27	can authenticate the SEC 10K filings.
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	Mike Golden
	Mr. Golden was a Sr. Manager of FedEx and
	disciplined Mr. Stites for making an

1		inappropriate sexual gesture (with his hand) to an employee.
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3	Ray Marino	Mr. Marino was an employee at FedEx and made a complaint about a inappropriate sexual gesture (with his hand) that Stites made to him during his employment..
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8	Stan Stephenson	Mr. Stephenson is Plaintiff's expert economist and will testify as to her wage loss and other losses of economic benefits.
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12	Florence Wandisan, M.D.	Dr. Wandisan will testify to treating Plaintiff for migrane headaches during the period in question.
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16	Ukeitha Thomas	Ms. Thomas was a co-worker of Plaintiff. Ms. Thomas was a percipient witness to the allegations of sexual harassment/discrimination against Plaintiff.
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21	Gary Yen	Mr. Yen was a co-worker of Plaintiff. Mr. Yen was a percipient witness to the allegations of sexual harassment/discrimination against Plaintiff.
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25	Eric Lai	Mr. Lai was a co-worker of Plaintiff. Mr. Lai was a percipient witness to the allegations of sexual harassment/discrimination against
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1		Plaintiff.
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3	Michael Synder	Mr. Synder will be a rebuttal witness as he will testify to inappropriate sexist statements made by Micheal Pigors.
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5	Claudia Miller	Ms. Miller was a co-worker of Plaintiff. Ms. Miller will speak about the operations of the facility that Plaintiff worked and will speak about the emotional distress that Plaintiff suffered due to the wrongful acts of the Defendant.
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7	Christopher Perry	Mr. Perry is a close friend of Plaintiff. Mr. Perry will speak to Plaintiff's emotional Distress during the period in question.
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9	Anetha DeCong	Ms. DeCong is a close relative of Plaintiff. Ms. DeCong will speak to Plaintiff's emotional Distress during the period in question.
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11	Jeff Davis	Mr. Davis is a close friend of Plaintiff. Mr. Davis will speak to Plaintiff's emotional Distress during the period in question.
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13	Charlotte Boswell	Plaintiff will testify to the allegations of harassment, sex discrimination, constructive discharge and retaliation. Plaintiff will testify
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1 _____ to the emotional distress suffered.
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6 Dated: September 25, 2006 LAW OFFICES OF WAUKEEN Q. McCLOY
7 /S/ Waukeen McCoy
8 By _____
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10 WAUKEEN Q. McCLOY
11 ATTORNEYS FOR PLAINTIFF
12 CHARLOTTE BOSWELL
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